

From: [Pocze, Doug](#)
To: [Hartzell, Sharon](#)
Cc: [Scorca, Michael](#); [Carpenter, Angela](#); [Metz, Chloe](#)
Subject: BNL TCRA
Date: Thursday, June 17, 2021 9:27:58 AM

Hi Sharon,

I reviewed the TCRA document. Overall I thought they did a good job.

Below are some comments on the document. The most encouraging comment I have is that the DOE recognizes the NYSDEC 10 ng/L as an ARAR. At this time most of the other federal agencies do not. Hopefully DOE does not reverse their position in the future.

Anyway take a look and we can talk.

PS: I sent the documents down to Hq for their input. They may ... or may not ... review the documents, but regardless at least we can say we've kept them in the loop. I gave them 2-3 weeks to provide any comments.

doug

1. General Comment 1: Was encouraged seeing that the DOE recognizes the NYSDEC 10 ng/L value as an ARAR and therefore defined the extent of contamination using this value
2. General Comment 2: The DOE has provided a signature line on the TCRA for EPA. Usually we just send a concurrence letter on TCRA documents. Does BNL need EPA to sign or would an approval letter be sufficient?
3. Page 9, Section III, Subsection 1.0, 2nd Paragraph: There is reference to sampling perform off site of private residences down gradient of the BNL facility. It indicates that there were no PFAS detections attributable to BNL operations. Please indicate how many wells were sampled and whether "no detections" means no results above the detection limit which should also be identified.
4. Page 10, Section V, Subsection 1.0, Removal Action Description: There is discussion of treatment groundwater contaminated with PFOA and PFOS and then discharging the treated water to the recharge basins. A SPDES permit will be obtained from the NYSDEC, but what is the limit BNL will use for the treated water to be discharged?
5. Page 11, Section V, Subsection 2, Contribution to Remedial Performance: The statement that, "... the RI characterization work will focus on filling data gaps in the distribution of and 1,4-dioxane contamination in on-site and off-site groundwater, and in the characterization of PFAS in source area soils." Should also indicate that the RI will address the remaining AOCs at the BNL facility. This TCRA is addressing the Current and Former Firehouses identified as the sources of the highest PFOA/PFOS. However other sources areas have been identified and will need to be addressed as part of the RI.

Douglas M. Pocze, Chief
USEPA
SEMD-SPB-FFS
290 Broadway
New York, NY 10007-1866

Tel: 212-637-4432